

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	<b>Case No. 3:19cr130</b>
	)	
<b>OKELLO T. CHATRIE,</b>	)	
<b>Defendant</b>	)	

**DEFENDANT OKELLO CHATRIE’S MOTION TO CONTINUE**  
**THE NOVEMBER 17, 2020, HEARING**

Okello Chatrie, through counsel, moves the Court to continue the November 17, 2020, hearing in this case to a time in February 2021 when the two Google employees under subpoena from the defense will appear in person to testify regarding Mr. Chatrie’s pending geofence motion to suppress in ECF No. 29. Mr. Chatrie had previously filed a motion to continue this case beyond the Speedy Trial Act cut-off date, which the Court granted. *See* ECF Nos. 34, 35. The Speedy Trial clock has been tolled in this case since October 22, 2019, when Mr. Chatrie filed a series of motions, which remain pending. *See* 18 U.S.C. § 3161(h)(1)(D) (excluding time involved in resolving motions from time of filing of motion to resolution of motion).

Undersigned counsel have consulted with Mr. Chatrie regarding the options the Court provided the parties in this case on Thursday, November 12, 2020, during a conference call regarding ECF Nos. 161, 166, and 167. During that conference call, the Court presented the parties with options to proceed with the hearing on the geofence motion to suppress the first week of December 2020 with the Google witnesses appearing remotely or for a completely in-person hearing in February 2021. Undersigned counsel presented those options to Mr. Chatrie and have Mr. Chatrie’s permission to move on his behalf to continue the November 17, 2020, hearing to February 2021 to allow for a completely in-person hearing on the geofence motion to suppress.

Thus, Mr. Chatrie moves the Court to continue the November 17, 2020, hearing on the geofence motion to suppress to February 2021. The parties are available on February 16, 2021, as previously discussed. Mr. Chatrie further asks that the Court continue the defense subpoenas to the Google employees to require their appearance on February 16, 2021.

Respectfully submitted,  
OKELLO T. CHATRIE

By: \_\_\_\_\_/s/\_\_\_\_\_

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